

EXHIBIT 37

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF JACKSON

In the Matter of:

HEIDI MARIE BROWN,

Petitioner,

and

ARNAUD PARIS,

Respondent, Pro Per.

Case No. 23CN05721.

**MOTION FOR SPECIAL
APPEARANCE WITHOUT WAIVING
OBJECTION TO SERVICE AND
JURISDICTION TO ASK FOR
DISQUALIFICATION OF JUDGE
BLOOM AND SUPPORTING
AFFIDAVIT**

***ORAL ARGUMENT REQUESTED
WITH REMOTE APPEARANCE OF
RESPONDENT WHO IS A PRO PER
PARTY LIVING IN FRANCE***

I, Arnaud Paris, Respondent, Pro Per, in the above-captioned case, moves this court under a motion for special appearance without waiving my right to objecting to jurisdiction or service in this matter to ask for an order for the disqualification of Judge Bloom in this matter as the Medford District Attorney Beth Heckert recently raised concern about Judge Bloom and Judge Orr judicial misconduct and lack of impartiality in the Jackson County proceedings.

Judge Bloom has also previously shown judicial bias against Respondent in the related case 22DR17285 by denying himself his own disqualification in "questionable" ways. See attached **Exhibit 01**, Letter from Counsel who represented Respondent at

1 the disqualification hearing. In this letter Christopher Eggert says: *"I am concerned that*
2 *some form of investigation by appropriate authorities is warranted to attempt to*
3 *determine whether the rights of Mr. Paris and his children are being upheld by the*
4 *Oregon courts."*

5 **STATEMENT AND POINTS OF AUTHORITIES:**

6 ORS 14.250 states that:

7 *"No judge of a circuit court shall sit to hear or try any suit, action, matter or proceeding*
8 *when it is established, as provided in ORS 14.250 (Disqualification of judge) to 14.270*
9 *(Time of making motion for change of judge in certain circumstances), that any party or*
10 *attorney believes that such party or attorney cannot have a fair and impartial trial or*
11 *hearing before such judge. In such case the presiding judge for the judicial district shall*
12 *forthwith transfer the cause, matter or proceeding to another judge of the court, or apply*
13 *to the Chief Justice of the Supreme Court to send a judge to try it; or, if the convenience*
14 *of witnesses or the ends of justice will not be interfered with by such course, and the*
15 *action or suit is of such a character that a change of venue thereof may be ordered, the*
16 *presiding judge may send the case for trial to the most convenient court; except that the*
17 *issues in such cause may, upon the written stipulation of the attorneys in the cause*
18 *agreeing thereto, be made up in the district of the judge to whom the cause has been*
19 *assigned. [1955 c.408 §1(1); 1981 c.215 §5; 1987 c.338 §1; 1995 c.781 §28]"*

20 ORS 14.260 states that:

21 *"Any party to or any attorney appearing in any cause, matter or proceeding in a circuit*
22 *court may establish the belief described in ORS 14.250 (Disqualification of judge) by*
23 *motion supported by affidavit that the party or attorney believes that the party or*
24

1 *attorney cannot have a fair and impartial trial or hearing before the judge, and that it is*
2 *made in good faith and not for the purpose of delay. No specific grounds for the belief*
3 *need be alleged.* The motion shall be allowed unless the judge moved against, or the
4 presiding judge for the judicial district, challenges the good faith of the affiant and sets
5 forth the basis of the challenge. In the event of a challenge, a hearing shall be held
6 before a disinterested judge. The burden of proof is on the challenging judge to
7 establish that the motion was made in bad faith or for the purposes of delay.”

8 ORS 14.270 states that:

9 “An affidavit and motion for change of judge to hear the motions and demurrers or to try
10 the case shall be made at the time of the assignment of the case to a judge for trial or
11 for hearing upon a motion or demurrer.”

12
13 **DECLARATION AND AFFIDAVIT FROM RESPONDENT:**

14 On May 28th 2024, I, Arnaud Paris, Respondent, Pro Per, was remotely
15 attending a hearing for disqualification of Judge Bloom in the related case 22DR17285
16 and his explanation for denying the disqualification seemed to be in contravention with
17 the ORS Statutes hereabove cited as my lawyer firmly noted.

18 Judge Bloom has just been assigned as a new judge to this case 23CN05721
19 and in light of the evidence presented in this motion I have clear ground to believe that I
20 won't be given a “fair and impartial trial or hearing” in this matter.

21 The decision by Judge Bloom to deny the motion for his disqualification on May
22 28th without substantive justification not only contravenes ORS 14.250 but also sets a
23 concerning precedent for the disregard of legal standards and procedural fairness.

1 After having felt that both Judge Orr and Judge Bloom were showing judicial bias
2 and were prejudiced against me in the Jackson County proceedings I find concerning
3 that the Medford District Attorney, Beth Heckert, has been expressing the same
4 concerns regarding both of these judges' lack of impartiality and judicial misconduct
5 over the years. See attached **Exhibit 02**, article from the Rogue Valley Times on April
6 27th, 2024. I don't feel that I will have a fair trial with Judge Bloom in this matter and I
7 would like to disqualify Judge Bloom under ORS 14.250 and ORS 14.260 for all the
8 reasons stated above.

9
10 **CONCLUSIONS AND PRAYERS FOR RELIEF:**

11 For all these reasons Father, Respondent Pro Per, believes that the
12 disqualification of Judge Bloom is necessary and required in this matter since Father
13 *cannot have a fair and impartial trial* under ORS 14.250 and ORS 14.260. Therefore,
14 Father asks that the "presiding judge for the judicial district shall forthwith transfer the
15 cause, matter or proceeding to another judge of the court, or apply to the Chief Justice
16 of the Supreme Court to send a judge to try it." (ORS 14.250). Since Judge Bloom is the
17 Presiding Judge then the court should apply to the Chief Justice of the Supreme Court
18 to send a judge to try it.

19 By filing with the court this motion of special appearance and supporting
20 declaration I do not waive my right to objecting to jurisdiction or service in this matter. I
21 hereby declare that the above statement is true to the best of my knowledge and belief,
22 and that I understand it is made for use as evidence in court and is subject to penalty for
23 perjury of the laws in the state of Oregon.

1 Prepared and filed by efile from Paris, France on June 6th 2024

2 

3 By: _____
4 ARNAUD PARIS, Respondent, Pro Per
5 13 rue Ferdinand Duval ,
6 75004, PARIS, FRANCE
Telephone: +33688283641
Email: aparis@sysmicfilms.com

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **MOTION FOR SPECIAL APPEARANCE WITHOUT WAIVING OBJECTION TO SERVICE AND JURISDICTION TO ASK FOR DISQUALIFICATION OF JUDGE BLOOM AND SUPPORTING AFFIDAVIT** on the following party:

Heidi Marie Brown
2256 Abbott Ave
Ashland, OR 97520
heidimparis@gmail.com
Petitioner, Pro Per

By the following method or methods:

_____ by **mailing** full, true, and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the attorneys(s) as shown above, the last known office address of the attorney(s), and deposited with the United States Postal Service at Portland, Oregon on the date set forth below.

X by **emailing** full, true, and correct copies thereof to the to the pro se party at the email address shown above, which is the last known email address for the Petitioner on the date set forth below.

_____ by **faxing** full, true, and correct copies thereof to the attorney(s) at the fax number(s) shown above, which is the last known fax number for the attorney(s) office, on the date set forth below. The receiving fax machines were operating at the time of service and the transmission was properly completed.

_____ by selecting the individual(s) listed above as a service contact when preparing this electronic filing submission, thus causing the individual(s) to be served by means of the **court's electronic filing system**.

Prepared in Paris, France on June 6th, 2024



By: _____
ARNAUD PARIS, Respondent Pro Per
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